

1 Jennifer L. Braster
Nevada Bar No. 9982
2 Benjamin B. Gordon
Nevada Bar No. 15552
3 NAYLOR & BRASTER
1050 Indigo Drive, Suite 200
4 Las Vegas, NV 89145
Telephone: (702) 420-7000
5 Facsimile: (702) 420-7001
jbraster@nblawnv.com
6 bgordon@nblawnv.com
7 Attorneys for Defendant
EXPERIAN INFORMATION
8 SOLUTIONS, INC.

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**
12

13 RAE ANN ODELL,
14

15 Plaintiff,
16

17 v.
18

19 ALPHAEON CREDIT INC.;
EXPERIAN INFORMATION
SOLUTIONS, INC.; TRANS UNION,
20 LLC; EQUIFAX INFORMATION
SERVICES LLC,
21

22 Defendants.
23

Case No. 2:22-cv-00037-APG-BNW

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANT EXPERIAN
INFORMATION SOLUTIONS, INC. TO
RESPOND TO COMPLAINT**

FIRST REQUEST

24 Pursuant to the Local Civil Rule IA 6-2, Plaintiff Rae Ann Odell
25 (“Plaintiff”) and Defendant Experian Information Solutions, Inc. (“Experian”),
26 through their respective attorneys of record, hereby stipulate that Experian shall
27 have an additional 14 days, up to and including **February 14, 2022**, to answer or
28 otherwise respond to Plaintiff’s Complaint. Experian requires additional time to
investigate Plaintiff’s allegations and discuss the possibility of early settlement with

1 Plaintiff. This is the first request for an extension of time sought by Experian in
2 this action. The requested extension is sought in good faith and not for the
3 purposes of delay or any other improper reason and will not alter the date of any
4 event or any deadline already fixed by Court order.

5 THEREFORE, Plaintiff and Experian hereby stipulate and agree to, and
6 respectfully request, an order extending the time for Experian to answer, object, or
7 otherwise respond to Plaintiff's Complaint, up through and including **February 14,**
8 **2022.**

9
10 Dated: January 28, 2022

NAYLOR & BRASTER LAW

11
12 By: /s/Benjamin B. Gordon

13 Jennifer Braster

14 Benjamin B. Gordon

15 Attorney for Defendant

16 EXPERIAN INFORMATION
SOLUTIONS, INC.

17 Dated: January 28, 2022

KAZEROUNI LAW GROUP, APC

18
19 By: /s/Gustavo Ponce

20 Gustavo Ponce

21 Mona Amini

22 Attorneys for Plaintiff

23 RAE ANN ODELL

24 **ORDER**

25 IT IS SO ORDERED.

26 DATED: January 31, 2022.

27 
UNITED STATES MAGISTRATE JUDGE